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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED HERITAGE CO. LTD.,

Plaintiff,

v.

**GARY SHIRNYAN AKA IGOR SEYRANOV,
MORA WEALTH MANAGEMENT**

Defendant.

Case No. 20-CV-102-S

MOTION FOR ENTRY OF DEFAULT

Plaintiff United Heritage Co. Ltd. hereby requests, pursuant to Federal Rules of Civil Procedure 55(a), that the Clerk of the Court enter the default of Defendant Gary Shirnyan aka Igor Seyranov. As support for this motion, this Plaintiff informs the Court of the following:

1. Plaintiff United Heritage Co. Ltd. filed their *Complaint* on June 10, 2020.
2. The *Summons* and *Complaint* were personally served on Gary Shirnyan aka Igor Seyranov, on July 29, 2020, in Los Angeles County, California. The *Answer* or responsive pleading was due on or before August 19, 2020.
3. The *Complaint* (Doc. 1) and the *Affidavit of Service* (Doc 10) are filed of record in this matter.
4. Gary Shirnyan aka Igor Seyranov has failed to plead, answer or otherwise object or defend to the *Complaint* served upon him.

WHEREFORE, pursuant to Federal Rule of Civil Procedure 55(a) Plaintiff United Heritage Co. Ltd. requests that the Clerk enter the default of Defendant Gary Shirnyan aka Igor Seyranov.

DATED this 2nd day of September, 2020.

Respectfully submitted,

/s/ Jason M. Tangeman
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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of September, 2020, the foregoing *Motion for Entry of Default* was filed by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system

/s/ Jason M. Tangeman
Jason M. Tangeman